

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CONSTRUCTION LABORERS PENSION	:	Civil Action No. 1:18-cv-07796-VEC
TRUST FOR SOUTHERN CALIFORNIA,	:	<b>(Consolidated)</b>
GENE SAMIT and JOHN LANTZ,	:	
Individually and on Behalf of All Others	:	<u>CLASS ACTION</u>
Similarly Situated,	:	
	:	LEAD PLAINTIFF’S NOTICE OF MOTION
Plaintiffs,	:	AND MOTION FOR FINAL APPROVAL OF
	:	CLASS ACTION SETTLEMENT AND
vs.	:	APPROVAL OF PLAN OF ALLOCATION
	:	
CBS CORPORATION and LESLIE	:	
MOONVES,	:	
	:	
Defendants.	:	
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff Construction Laborers Pension Trust for Southern California (“Lead Plaintiff”), on behalf of the Settlement Class, by its undersigned counsel, will move this Court on November 3, 2022, at 2:30 p.m., before the Honorable Valerie E. Caproni at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 443, New York, New York 10007, or as soon thereafter as the parties can be heard, for the entry of orders and a judgment, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (i) for the purposes of settlement only, certifying the Settlement Class, certifying Lead Plaintiff as the class representative on behalf of the Settlement Class and appointing Lead Counsel as Class Counsel for the Settlement Class; (ii) granting final approval of the proposed Settlement between Lead Plaintiff and CBS Corporation n/k/a Paramount Global and Leslie Moonves, as set forth in the Stipulation and Agreement of

Settlement, previously filed with the Court (ECF 177); (iii) approving the proposed Plan of Allocation; and (iv) for such further relief as is just.<sup>1</sup>

In support of this motion, Lead Plaintiff relies on: (i) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; (ii) the Declaration of Spencer A. Burkholz in Support of: (1) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (2) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (iii) the Declaration of Lead Plaintiff; (iv) the Declaration of Ross D. Murray; (v) the Stipulation and Agreement of Settlement; and (vi) all other proceedings herein.

Proposed orders will be submitted with Lead Plaintiff's reply submission on or before October 27, 2022.

DATED: August 19, 2022

Respectfully submitted,

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SAMUEL H. RUDMAN  
VINCENT M. SERRA



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<sup>1</sup> Unless stated otherwise, all capitalized terms used herein have the meanings set forth and defined in the Stipulation and Agreement of Settlement.

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Lead Counsel for Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on August 19, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ VINCENT M. SERRA

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## Mailing Information for a Case 1:18-cv-07796-VEC Samit v. CBS Corporation et al

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### Manual Notice List

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